#### Message

From: Sanchez, Rafael [Sanchez.Rafael@epa.gov]

**Sent**: 10/28/2021 5:14:44 PM

To: Spidle, Todd (HHT) [SpidleT@hearthnhome.com]; Fongeallaz, Bud (HHT) [FongeallazB@hearthnhome.com]

CC: WoodHeaterReports [WoodHeaterReports@epa.gov]; Podschelne, Corie (HHT) [PodschelneC@hearthnhome.com];

Scinta, Robert [scinta.robert@epa.gov]; Malave, Maria [Malave.Maria@epa.gov]; Yellin, Patrick

[Yellin.Patrick@epa.gov]

Subject: RE: Harman Accentra 52iTC renewal

Importance: High

Thank you for the clarification. I will need a request letter from HHT to process a renewal. See below:

#### **RENEWAL PROCESS**

Please submit the following information to the EPA regarding the renewal of the current certification before the certification expiration date.

In addition, keep in mind that the EPA-approved certifier must review the request *before* EPA submission (see number 4 below).

- A signed request from the manufacturer listing the model name(s), certification number, and a compliance statement. It should state whether modifications have been made to the stove since the last EPA certification. If no modification since the previous EPA certification has been made, then the manufacturer may request a potential waiver from certification testing. That is, affirm in your letter that no changes have been made to the stove, and therefore, you are seeking a recertification waiver from the Agency
- 2. Submit a copy of the EPA certification letter.
- 3. Submit a summary of the test report (first 15 pages of the test report). This is optional but expedites the process.
- 4. A certification of conformity from the EPA-approved certifier.

See below: 60.533.

- (i) Renewal of certification.
- (1) The manufacturer must request renewal of a model line's certificate of compliance or recertify the model line every 5 years, or the manufacturer may choose to no longer manufacture or sell that model line after the expiration date. If the the manufacturer chooses to no longer manufacture that model line, then the manufacturer must submit a statement to the Administrator to that effect.
- (2) A manufacturer of an affected wood heater model line may apply to the Administrator for potential renewal of its certificate of compliance by submitting the material specified in paragraph (b) and following the procedures specified in paragraph (f) of this section, or by affirming in writing that the wood heaters in the model line continue to be similar in all material respects that would affect emissions to the representative wood heater submitted for testing on which the original certificate of compliance was based and requesting a potential waiver from certification testing. The application must include a copy of the review of the draft application and approval by the third-party certifier.

If you have any questions, please let me know.

### Rafael Sanchez, Ph.D. Wood Heater Program Manager

Air Branch
Monitoring, Assistance, and Media Programs Division
Office of Compliance
U.S. Environmental Protection Agency (EPA)
Room 7149-D
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### Questions about Wood Heaters or Certifications? Please send them to WoodHeaterReports@epa.gov

Are you looking for a wood heater or central heater? Please try our fully searchable <u>EPA Certified Wood Heater Database</u> (https://www.epa.gov/compliance/epa-certified-wood-heater-database).

From: Spidle, Todd (HHT) <SpidleT@hearthnhome.com>

Sent: Thursday, October 28, 2021 12:52 PM

To: Sanchez, Rafael <Sanchez.Rafael@epa.gov>; Fongeallaz, Bud (HHT) <FongeallazB@hearthnhome.com>

**Cc:** WoodHeaterReports < WoodHeaterReports@epa.gov>; Podschelne, Corie (HHT) < PodschelneC@hearthnhome.com>; Scinta, Robert < scinta.robert@epa.gov>

Subject: RE: Harman Accentra 52iTC renewal

Rafael,

I believe what Bud is trying to say is that this units certification runs out on April 24<sup>th</sup> 2022 which is 5 years after April 24<sup>th</sup> 2017. If I am correct, this means we will no longer be able to build the unit past that date per your standard. We are simply being proactive on getting the certification "renewed". Nothing has changed with the existing model as for clearances or emissions. We are simply looking for certification renewal so that we can keep building the unit past April 24th 2022.

If something has changed with the length of the certification please let us know.

Thank you!

Todd Spidle

Hearth Expert

Technical Writer II - Halifax, PA

P: 717-362-5124 | spidlet@hearthnhome.com

From: Sanchez, Rafael <<u>Sanchez.Rafael@epa.gov</u>> Sent: Thursday, October 28, 2021 12:28 PM

To: Fongeallaz, Bud (HHT) < Fongeallaz B@hearthnhome.com >

**Cc:** WoodHeaterReports < <u>WoodHeaterReports@epa.gov</u>>; Podschelne, Corie (HHT)

<PodschelneC@hearthnhome.com>; Spidle, Todd (HHT) <SpidleT@hearthnhome.com>; Scinta, Robert

<scinta.robert@epa.gov>

Subject: Re: [EXTERNAL] Harman Accentra 52iTC renewal

Importance: High

Mr. Fongeallaz,

Thank you for the submission. I still need a response to my questions from the earlier email. See below:

Lastly, our records show that EPA certified the Harman Accentra 52iTC pellet on April 24, 2017. Is this an upgrade to the existing model? Would you please clarify why HHT is requesting certification of a model currently certified to the 2020 NSPS? Also, explain your plans for the existing model if the new request updates the current model.

Rafael Sanchez, Ph.D.
Wood Heater Program Manager
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From: Fongeallaz, Bud (HHT) <FongeallazB@hearthnhome.com>

**Sent:** Thursday, October 28, 2021 12:18 PM **To:** Sanchez, Rafael < Sanchez, Rafael@epa.gov>

**Cc:** WoodHeaterReports < <u>WoodHeaterReports@epa.gov</u>>; Podschelne, Corie (HHT) < <u>PodschelneC@hearthnhome.com</u>>; Spidle, Todd (HHT) < <u>SpidleT@hearthnhome.com</u>>

Subject: Harman Accentra 52iTC renewal

All,

Please find within the Dropbox the application, Non-CBI report, CoC and CBI letter for the Harman Accentra 52iTC. We have also sent all necessary documentation via certified mail which you should receive shortly.

And we submitting for renewal on the Harman Accentra 52iTC as it expires in April 2022.

# Ex. 4 CBI